

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

_____)	
UNITED STATES OF AMERICA,)	
)	
v.)	
)	No. 20-CR-10098-WGY
BRIAN GILBERT, STEPHANIE POPP,)	
STEPHANIE STOCKWELL and)	
VERONICA ZEA)	
)	
Defendants)	
_____)	

SUPPLEMENT TO
SENTENCING MEMORANDUM OF DEFENDANT VERONICA ZEA

Veronica Zea hereby supplements her Sentencing Memorandum to correct factual errors in the Presentence Investigation Report (“Report”). This supplement is not intended to in any way diminish Veronica Zea’s acceptance of responsibility for her participation in the events referred to in the Information on file herein, but rather to present a more complete picture of the extent of that involvement.

Paragraph 17 and 28 of the Report: Veronica Zea did not participate in developing the list of potential items to be sent to the victims’ home although she did purchase the gift cards later used to facilitate the purchase of some of those items. When, after purchasing the gift cards, she returned to the meeting at which the list was developed, Veronica was disturbed by many of the items on the list and was successful in persuading Jim Baugh not to send a coffin and a funeral wreath.

Paragraph 19, 84 and 139: Veronica Zea told the Natick Police Officer who contacted her by phone in her hotel room that she might be able to meet with him after finishing some work

calls. Other than that one contact, she had no other conversation with the Natick Police. As set forth in the Presentence Investigation Report, the only other contact she had with the Natick Police occurred when the police officer contacted her by phone and Jim Baugh pulled the phone away and lied to the officer about being Veronica's husband. As set forth in her Sentencing Memorandum, Veronica admits providing false information to eBay during its investigation.

Paragraph 52: Veronica Zea intentionally did not bring the magic markers with her to Boston.

Paragraph 72: Veronica Zea was not in the car with Baugh and Popp during the surveillance on August 18, 2019; rather, she was waiting in the small-town square in Natick.

Respectfully submitted,

FRANK R. UBHAUS,

/s/ Frank R. Ubhaus

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October 26, 2022

Certificate of Service

I hereby certify that on this 26th day of October, 2022, this document was filed through the Court's ECF system and will therefore be sent electronically to the registered participants identified in the Notice of Electronic Filing.

/s/ Frank R. Ubhaus

Frank R. Ubhaus